FY2016

AVIATION SUPPLY FACILITY, 49-A Army Defense Environmental Restoration Program Installation Action Plan

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Statement of Purpose

The purpose of the Installation Action Plan (IAP) is to outline the total multiyear cleanup program for an installation. The plan identifies environmental cleanup requirements at each site or area of concern (AOC), and proposes a comprehensive, installation-wide approach, along with the costs and schedules associated with conducting investigations and taking the necessary remedial actions RAs.

In an effort to coordinate planning information between the restoration manager, the 81st Regional Support Command (RSC), the US Army Environmental Command (USAEC), the Installation Management Command-Army Reserve Office (IMCOM-ARO), Aviation Supply Facility, 49-A, the executing agencies, the regulatory agencies, and the public, an IAP was completed. The IAP is used to track requirements, schedules, and budgets for all major Army installation cleanup programs.

All site-specific funding and schedule information has been prepared according to projected overall Army funding levels and is, therefore, subject to change.

Acronyms

AEDB-R Army Environmental Database - Restoration AOC Area of Concern ARO Army Reserve Office ASF Aviation Supply Facility CAP Corrective Action Plan CC Compliance-related Cleanup CIP Community Involvement Plan COC Contaminant of Concern **CR** Compliance Restoration DD Decision Document DERP Defense Environmental Restoration Program DES Design FDEP Florida Department of Environmental Protection FL Florida FRA Final Remedial Action FY Fiscal Year GCTL Groundwater Cleanup Target Levels IAP Installation Action Plan IMCOM-ARO Installation Management Command - Army Reserve Office IMP(C) Implementation (Construction) IMP(O) Implementation (Operations) **INV** Investigation IR Installation Restoration IRA Interim Remedial Action IRP Installation Restoration Program ISC Initial Site Characterization K thousand LTM Long-Term Management MMRP Military Munitions Response Program MR Munitions Response N/A Not Applicable NFA No Further Action NPL National Priority List ODUSD Office of the Deputy Under Secretary of Defense for Installations and Environment POL Petroleum, Oil and Lubricants RA Remedial Action RAB Restoration Advisory Board RC Response Complete RCRA Resource Conservation and Recovery Act RIP Remedy-in-Place ROD Record of Decision RSC Regional Support Command

TAPP Technical Assistance for Public Participation

TBD To Be Determined

AEDB-CC Army Environmental Database - Compliance-related Cleanup

Acronyms

TRC Technical Review Committee

ug/L micrograms per liter

USAEC US Army Environmental Command

USARC US Army Reserve Center

UST Underground Storage Tank

Acronym Translation Table

CERCLA

Preliminary Assessment(PA)

Remedial Investigation(RI)

Feasibility Study(FS)

Remedial Design(RD)

Remedial Action (Construction)(RA(C))

Remedial Action (Operation)(RA(O))

Long Term Management(LTM)

Interim Remedial Action(IRA)

RCRA Underground Storage Tank (UST) Site Phase Terms

- = Initial Site Characterization(ISC)
- Investigation(INV)
- = Corrective Action Plan(CAP)
- = Design(DES)
- = Implementation (Construction)(IMP(C))
- = Implementation (Operations)(IMP(O))
- = Long Term Management(LTM)
- = Interim Remedial Action(IRA)

Installation Information

Installation Locale

Installation Size (Acreage): 34

City: Orlando County: Orange State: Florida

Other Locale Information

The Orlando Aviation Supply Facility (ASF), consisting of 34 acres, is located in the western portion of the Orlando International Airport. The Orlando ASF includes a parachute drying and maintenance facility, an aircraft hangar and maintenance shop.

Installation Mission

Aircraft Helicopter Maintenance.

Lead Organization

IMCOM

Lead Executing Agencies for Installation

81st RSC

Regulator Participation

State Florida Department of Environmental Protection (FDEP)

National Priorities List (NPL) Status

AVIATION SUPPLY FACILITY, 49-A is not on the NPL

Installation Restoration Advisory Board (RAB)/Technical Review Committee (TRC)/Technical Assistance for Public Participation (TAPP) Status

Installation has no sites in RI phase.

Installation Program Summaries

CR

Primary Contaminants of Concern: Petroleum, Oil and Lubricants (POL)

Affected Media of Concern: Groundwater

5-Year / Periodic Review Summary

No 5-Year / Periodic Reviews have been scheduled

Cleanup Program Summary

Installation Historic Activity

The ASF was constructed in 1952 for the purpose of aircraft maintenance activities. The source of the contamination was a former drum storage area that was used to store POL and an above ground oil water separator on-site. This contamination was identified in 1999.

The FDEP was notified of this finding, and on May 10, 2000, FDEP required the 81st to conduct further investigation to delineate the extent of the contamination. In April 2001 a site assessment report, which showed soil and groundwater contamination, was completed.

In June 2002 FDEP approved the soil remediation action plan.

In July 2002 approximately 267 tons of petroleum-contaminated soil was removed from this site to approximately 6 feet below ground surface and properly disposed of.

In August 2003 FDEP approved no further action (NFA) for soils and issued the Natural Attenuation Monitoring Plan Order for groundwater.

In February 2004, the first round of groundwater samples was completed.

In March 2009 the tenth and final report was submitted with naphthalene measured at 54 micrograms per liter (ug/L) which exceeds the FDEP groundwater cleanup target level (GCTL) of 20 ug/L.

The naphthalene levels in monitoring well OBG-1s have not stabilized below the 20 ug/L GCTL.

In order to receive an NFA approval from FDEP, there must be two consecutive sampling events with all parameters below the GCTL. This has not been achieved.

An NFA has been requested and denied on this project. There was confusion about the GCTL being 200 ug/L or 20 ug/L. Originally we thought 200 ug/L was the GCTL. The 200 ug/L limit is an action level. If the naphthalene exceeds 200 ug/L then extra sampling and reporting would be needed. The GCTL is 20 ug/L.

Except for naphthalene, all other contaminants of concern (COC) have remained below the prescribed GCTL. Naphthalene has been as low as 0.619 ug\L and as high as 71.5 ug\L over the past five years.

As per the Natural Attenuation Monitoring Plan Order dated Aug. 29, 2003, "if the applicable NFA criteria in rule 62-770.680 F.A.C. are not met following the five years of monitoring, then a report summarizing the monitoring program must be submitted, including a proposal as described in rule 62-770.690(7)(g), F.A.C."

The first report was submitted February 2004; as of March 2009, we are at the five-year mark. The naphthalene levels in monitoring well OBG-1s have not stabilized below the 20 ug/L GCTL.

Environmental restoration activities include the Installation Restoration Program (IRP) and Military Munitions Response Program (MMRP). On Dec. 29, 2008, the Office of the Deputy Under Secretary of Defense for Installations and Environment [ODUSD(I&E)], issued an interim policy for Defense Environmental Restoration Program (DERP) eligibility that rescinded the 1986 eligibility date for the IRP and the 2002 eligibility date for the MMRP. This made many sites previously addressed in the Army's Environmental Database-Compliance-related Cleanup (AEDB-CC) program eligible for the DERP. Sites that are now eligible for the MMRP program have been migrated from AEDB-CC and given the naming convention of other MMRP sites. The newly eligible non-Munitions Response (MR) type sites are considered to be IRP sites; however, the newly eligible sites are being coded as compliance restoration (CR) in Army Environmental Database - Restoration (AEDB-R) to distinguish them from the original IRP sites and IRP metrics.

Installation Program Cleanup Progress

Cleanup Program Summary

CR

Prior Year Progress: Three rounds of groundwater sampling showed that naphthalene concentrations in groundwater were

all below the Florida standard, so a Post-Active Remediation Monitoring Report recommending no further action was submitted to Florida in early fiscal year (FY)15, but then soil contamination was found during a building demolition, causing further investigation/remediation to be planned.

Future Plan of Action: The soil contamination will be investigated and remediated appropriately.

AVIATION SUPPLY FACILITY, 49-A Army Defense Environmental Restoration Program Compliance Restoration

CR Summary

Installation Total Army Environmental Database-Restoration (AEDB-R) Sites/Closeout Sites Count: 1/0

Installation Site Types with Future and/or Underway Phases

1 Contaminated Ground Water

(CC-FL024)

Most Widespread Contaminants of Concern

Petroleum, Oil and Lubricants (POL)

Media of Concern

Groundwater

Completed Remedial Actions (Interim Remedial Actions/ Final Remedial Actions (IRA/FRA))

Site ID	Site Name	Action	Remedy	FY
CC-FL024	Orlando ASF	FRA	NATURAL ATTENUATION	2004
CC-FL024	Orlando ASF	FRA	BIOREMEDIATION - IN SITU GROUNDWATER	2012

Duration of CR

Date of CR Inception: 200006

Estimated Date for Remedy-In-Place (RIP)/Response Complete (RC): 201209/201710

Date of CR completion including Long Term Management (LTM): 201710

CR Contamination Assessment

Contamination Assessment Overview

Environmental restoration activities include the IRP and MMRP. On Dec. 29, 2008, the ODUSD(I&E) issued an interim policy for DERP eligibility that rescinded the 1986 eligibility date for the IRP and the 2002 eligibility date for the MMRP. This made many sites previously addressed in the Army's Compliance-related Cleanup (CC) program eligible for the DERP. Sites that are now eligible for the MMRP have been migrated from AEDB-CC and given the naming convention of other MR sites. The newly eligible non-MR type sites are considered to be installation restoration (IR) sites; however, the newly eligible sites are being coded as CR in AEDB-R to distinguish them from the original IR sites and IR metrics.

Cleanup Exit Strategy

An NFA request is currently being prepared and will be submitted to FDEP. Pending NFA approval, semiannual groundwater sampling for fuels at two wells will continue until the site achieves test results below regulatory action levels and NFA for groundwater is obtained. Following NFA approval, 10 wells at the site will be abandoned.

CR Previous Studies

Title **Author** Date

There are no Previous Studies

AVIATION SUPPLY FACILITY, 49-A

Compliance RestorationSite Descriptions

Site ID: CC-FL024
Site Name: Orlando ASF



Regulatory Driver: RCRA

Contaminants of Concern: Petroleum, Oil and Lubricants

(POL)

Media of Concern: Groundwater

Phases	Start	End
ISC	200006	200104
INV	200105	200308
CAP	200105	200308
DES	200309	200312
IMP(C)	200401	201209
IMP(O)	200402	201710

RIP Date: 201209 **RC Date**: 201710

SITE DESCRIPTION

The Aviation Support Facility (ASF) was constructed in 1952 for aircraft (helicopters) maintenance activities, but is no longer active. This site, the Orlando ASF, was a former POL drum storage area and oil/water separator. Two underground storage tanks (USTs) were removed in 1995. Contamination was discovered in 1999 in both soil and groundwater. In 2002, approximately 267 tons of contaminated soil and the oil/water separator were removed and disposed of off-site. Confirmatory samples were collected and tested for fuels. A No Further Action (NFA) letter for soils was granted by the Florida Department of Environmental Protection (FDEP) in August 2003, but not for groundwater due to the presence of naphthalene (the source is assumed to have been the oil/water separator).

FDEP issued a Natural Attenuation Monitoring Plan Approval Order in August 2003 (i.e., the decision document) requiring 5 years of semi-annual groundwater sampling at two wells. MNA monitoring was conducted from 2004-2009, but naphthalene levels in groundwater did not fall below the FL standard (14 ug/L). In 2010, the 81st RSC decided to conduct in-situ bioremediation at the site in an attempt to treat the naphthalene and close the site. Two proprietary Micro-Bac International products were injected in 2011. As of Sep 2012, naphthalene concentrations had rebounded following an initial dip after treatment and were still above the State standard.

In 2013, after consultations with FDEP, it was decided that 3 more rounds of GW monitoring would be conducted to get a better idea of what the contamination situation was. This sampling occurred in 2014. Naphthalene concentrations in all 3 rounds were below the state standard. In early FY15, a Post-Active Remediation Monitoring Report recommending no further action was prepared and submitted to FL. Unfortunately, in mid-March, during demolition of a hanger on the property, petroleum contaminated soil was encountered. It appears related to the groundwater; resulting in the need for further action before the site can be closed.

A supplemental Site Assessment Work Plan was submitted in Feb 2016. The supplemental Site Assessment will evaluate soil contamination. Completed Site Assessment Report will be submitted in Sept 2016.

CLEANUP/EXIT STRATEGY

An NFA request is currently being prepared and will be submitted to FDEP. Pending NFA approval, semiannual groundwater sampling for fuels at two wells will continue until the site achieves test results below regulatory action levels and NFA for groundwater is obtained. Following NFA approval, 10 wells at the site will be abandoned.

Site Closeout (No Further Action) Summary

NFA Date Site ID Site Name **Documentation**

There are no NFA sites

CR Schedule

Date of CR Inception: 200006

Past Phase Completion Milestones

2001

ISC (CC-FL024 - Orlando ASF)

2003

CAP (CC-FL024 - Orlando ASF) INV (CC-FL024 - Orlando ASF)

2004

DES (CC-FL024 - Orlando ASF)

2012

IMP(C) (CC-FL024 - Orlando ASF)

Projected Phase Completion Milestones

See attached schedule

Projected Record of Decision (ROD)/Decision Document (DD) Approval Dates

Site ID Site Name ROD/DD Title ROD/DD Date

Final RA(C) Completion Date: 201209

Schedule for Next Five-Year Review: N/A

Estimated Completion Date of CR at Installation (including LTM phase): 201710

AVIATION SUPPLY FACILITY, 49-A CR Schedule

						= phase u		
SITE ID	SITE NAME	PHASE	FY17	FY18	FY19	FY20	FY21	FY22+
CC-FL024	Orlando ASF	IMP(O)						

Community Involvement

Technical Review Committee (TRC): None

Community Involvement Plan (Date Published): TBD

Restoration Advisory Board (RAB): No

Reason Not Established: Installation has no sites in RI phase.

Additional Community Involvement Information

CC-FL024 was previously part of AEDB-CC and the solicitation of a RAB was not required. Because of new DERP eligibility requirement, CC-FL024 is now part of the CR program which requires that public interest in a RAB be solicited every two years if a RAB has not been established. The 81st RSC does not anticipate soliciting for a RAB as it is assumed CC-FL024 will be RC before the two year requirement takes effect.

Additionally, because the site is within the boundaries of the Orlando International Airport and is not accessible to the community and because the property is not owned by the 81st RSC, the development of a community involvement plan (CIP) and information repository are not planned.

Administrative Record is located at

FL023 Taft US Army Reserve Center (USARC) 2800 Dowden Road Orlando, Florida 32812 407.816.2659

Information Repository is located at

An information repository is not planned (see above).

Current Technical Assistance for Public Participation (TAPP):N/A

TAPP Title: N/A

Potential TAPP: N/A